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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Adv. Pro. No. 08-01789 (CGM)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

(Substantively Consolidated)

Defendant.

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Adv. Pro. No. 10-05421 (CGM)

Plaintiff,

v.

FRANK J. AVELLINO, *et al.*,

Defendants.

**SUPPLEMENTAL DECLARATION OF REGINA GRIFFIN IN FURTHERSUPPORT
OF TRUSTEE'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Regina Griffin, declare the following:

1. I am a Partner with the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff. I submit this Supplemental Declaration in further support of the Trustee’s Motion for Partial Summary Judgment.

2. Attached hereto as Exhibit 55 is a true and correct copy of BLMIS Account Maintenance File of Michael Mann (TX021) (AMF00256511-547).

3. Attached hereto as Exhibit 56 is a true and correct copy of BLMIS Account Maintenance File of BAM L.P. (TX022) (AMF00267004-081).

4. Attached hereto as Exhibit 57 is a true and correct copy of BLMIS Customer Agreements for Carol Nelson (TX338) (AMF00008168-176).

5. Attached hereto as Exhibit 58 is a true and correct copy of BLMIS Customer Agreements for Carol Nelson (TX339) (AMF00114567-574).

6. Attached hereto as Exhibit 59 is a true and correct copy of BLMIS Customer Agreements for Carol Nelson & Stan Nelson (TX340) (AMF00008290-298).

7. Attached hereto as Exhibit 60 are true and correct copies of excerpts from the deposition of Stanley Fortgang dated December 10, 2020.

8. Attached hereto as Exhibit 61 is a true and correct copy of the deposition of Theodore V. Cacioppi dated May 15, 2019.

9. Attached hereto as Exhibit 62 is a true and correct copy of a redacted FD-302 Statement of Bernard Madoff dated December 12, 2008.

10. Attached hereto as Exhibit 63 is a true and correct copy of Defendant Thomas G. Avellino, Strattham Partners, Ascent, Inc. and S.A's Answers to Amended Complaint And Counterclaim, dated November 2, 2016, ECF No. 141.

11. Attached hereto as Exhibit 64 are true and correct copies of supplemental excerpts from the testimony of Frank DiPascali, Jr. during the multi-day criminal trial *United States v. Bonventure*, No. 10-CR-228 (LTS) (S.D.N.Y.), ECF No. 854.

12. Attached hereto as Exhibit 65 is a true and correct copy of BLMIS Customer Statement of Strattham (Exhibit D-6) (STR0000216-225).

13. Attached hereto as Exhibit 66 is a true and copy of excerpts of the deposition testimony of Frank Avellino dated September 9, 2015 in *P&S Associates General Partnership, et al. v. Michael D. Sullivan, et al.*, 17th Judicial Circuit, Broward County Complex Litigation Unit, Case No. 12-034123 (007).

14. Attached hereto as Exhibit 67 is a true and correct copy of excerpts of the deposition testimony of Michael Bienes dated September 10, 2015 in *P&S Associates General Partnership, et al. v. Michael D. Sullivan, et al.*, 17th Judicial Circuit, Broward County Complex Litigation Unit, Case No. 12-034123 (007).

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements are true and correct.

Dated: May 23, 2022
New York, New York

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ Regina Griffin
Regina Griffin